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Following our conversation with the Committee's analyst on December 9, 2015, the Committee is providing additional comments regarding the 48-hour report filed August 27, 2015: the disbursements at issue were not targeted at any particular state or set of states, but were distributed nationally, with the goal of influencing the outcome of the 2016 GOP National Nominating Convention. Consistent with that aim, and with the Commission's proposed interpretive rules on reporting nationwide independent expenditures in presidential primary elections, the Committee reported these expenditures as being for the Convention, and not, as would be factually incorrect, for one or more states. As the Commission's proposed rules recognize, artificially separating a national communication into the various states it incidentally comprises is burdensome to filers and works against the goals of disclosure by misrepresenting the reported activity. In this case, the manner in which the Commission wants the Committee to report the expenditures at issue is so inaccurate that the Committee has been unable to find any staff member willing to sign such a report under penalty of perjury. In the interest of preventing the waste of further administrative resources on senseless harassment of committees attempting to more fully disclose their activity, the Committee once more encourages the Commission to provide better and more consistent guidance for reporting national communications.
